



September 13, 2002

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street S.W., TW-A325
Washington, D.C. 20554

Re: *Ex Parte* Notice
CC Docket No. 96-45, 98-171, 90-571, 92-237, NSD File No. L-00-72, 99-200,
95-116, and 98-170, FCC 02-43

Dear Ms. Dortch:

On Friday, September 13, 2002, L. Marie Guillory and Daniel Mitchell representing the National Telecommunications Cooperative Association met with Paul Garnett, Diane Law Hsu, and Vickie Byrd of the Wireline Competition Bureau to discuss the above-referenced matter. NTCA's representatives discussed its position concerning the proposed universal service contribution assessment methodologies. Enclosed please find the handout given at the meeting summarizing NTCA's position.

In accordance with the FCC's rules, an original and two copies of this letter are being filed with the Secretary's office. If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

/s/ Daniel Mitchell
Daniel Mitchell
Sr. Regulatory Counsel

cc: Paul Garnett
Diane Law Hsu
Vickie Byrd

NTCA Position

- 1) The assessment methodology should maintain the stability of the funds.
- 2) The contribution base should be expanded to include interstate telecommunications providers as well as providers of telecommunications services.
- 3) The mechanism should be implemented in a way that no provider gains a competitive advantage.
- 4) Safe harbor rules should not shield wireless carriers from the requirement to contribute on an equitable basis.
- 5) IXC's should not be allowed to escape their obligation to contribute on an equitable basis.
- 6) A connection based approach should not penalize specific classes of customers.
- 7) *A de minimis* exception should be retained in the interest of administrative simplicity.
- 8) The Commission's decision should be based on a record that permits it to evaluate the financial impact of its decision.
- 9) The methodology should recognize the shift of interstate traffic and revenues resulting from changes in technology and service provision.